REMARKS

In response to the Office Action dated June 8, 2006, Applicant respectfully requests reconsideration based on the above claim amendments and the following remarks. Applicant respectfully submits that the claims as presented are in condition for allowance.

Applicant has amended independent claims 1 and 2. Applicant has not added or canceled any claims. Thus, claims 1-4 remain pending in the present application.

Claim Rejections – 35 U.S.C. § 103(a)

Claims 1-4

In the Office Action, claims 1-4 are rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,947,959 to Gill ("Gill") in view of U.S. Patent No. 6,151,637 to Phillips et al. ("Phillips"). Applicant respectfully traverses the rejections and respectfully requests reconsideration and withdrawal.

Claim 1 has been amended to recite the following features:

> "a client tracking server object derived from a server class that provides an implementation of a query interface function that overrides the query interface function of the server class, wherein a phantom manager object is a data member of the client tracking server class, wherein a phantom server object is instantiated when the query interface function of the client tracking server class is invoked, wherein a class of the phantom server object is inherited from the server class, and wherein when a client object invokes a function of a phantom server object of the phantom server object, the function is custom processed by the phantom server object before forwarding the invocation of the function to the client tracking server object."

Claim 2 has been amended to recite the following features:

> "wherein a phantom server class that includes functions that correspond to the functions of the server class and that have the same signature as the corresponding function of the server class is provided; wherein a phantom manager class that includes a create function for instantiating a phantom server object of the phantom server class and returns a reference to the phantom server object is provided; wherein a client tracking

server class that is a derivation of the server class wherein the query function of the client tracking server class invokes the create function of the phantom manager class is provided; wherein a client tracking server object is instantiated; wherein the query function of the client tracking server object is invoked; wherein the query function invokes the create function of a phantom manager object which instantiates a phantom server object; wherein the query function returns a reference to the phantom server object."

Gill is directed to digital asset management. A database stores information related to digital assets, which may be retrieved in accordance with user queries. Management across a distributed architecture is optimized through load monitoring and balancing. Phillips discloses an interoperability component for formatting transactions. A transaction processor processes transactions for an application.

Gill and Phillips, either alone or in combination, do not teach or suggest the "phantom server object is instantiated when the query interface function of the client tracking server class is invoked" and "a class of the phantom server object is inherited from the server class, and wherein when a client object invokes a function of a phantom server object of the phantom server object, the function is custom processed by the phantom server object before forwarding the invocation of the function to the client tracking server object" features of claim 1.

Nor do the combination of Gill and Phillips teach or suggest at least the invoking of the "query function of the client tracking server object" and the invoking of "the create function of a phantom manager object which instantiates a phantom server object; wherein the query function returns a reference to the phantom server object."

In fact, neither Gill nor Phillips disclose the instantiation of a phantom server object when the query interface function of the client tracking server class is invoked, and there is no indication in either reference of corresponding functions between a phantom server class and a server class where the phantom server class has the same signature as the corresponding function of the server class.

Thus, Applicant submits that claims 1 and 2 patentably define over the cited Gill and Phillips references. Furthermore, claims 3 and 4 are dependent upon claim 1 and are thus patentable for at least the same reasons as independent claim 1. Therefore, for the reasons

stated above, Applicant respectfully requests withdrawal of the § 103(a) rejection of claims 1-4 because these claims patentably define over the cited art.

Conclusion

For all the foregoing reasons, Applicant respectfully submits that the pending claims patentably define over the cited art. Accordingly, a Notice of Allowance for claims 1-4 is respectfully requested. In the event, however, that the Examiner believes that the application is not allowable for any reason, the Examiner is encouraged to contact the undersigned agent to discuss resolution of any remaining issues.

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Erin E. Pacella
Registration No. 56,239

Woodcock Washburn LLP
One Liberty Place - 46th Floor
Philadelphia PA 19103
Telephone: (215) 568-3100
Facsimile: (215) 568-3439